

**Paula A. Barran**, OSB No. 803974  
pbarran@barran.com  
**Shayda Zaerpoor Le**, OSB No. 121547  
sle@barran.com  
**Donovan L. Bonner**, OSB No. 181929  
dbonner@barran.com  
Barran Liebman LLP  
601 SW Second Avenue  
Suite 2300  
Portland, Oregon 97204-3159  
Telephone: (503) 228-0500  
Facsimile No.: (503) 274-1212  
Attorneys for Defendants  
University of Oregon and Hal Sadofsky

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

Portland

JENNIFER JOY FREYD,

**CV. 6:17-cv-448-MC**

Plaintiff,

v.

UNIVERSITY OF OREGON, MICHAEL H.  
SCHILL and HAL SADOFSKY,

Defendants.

**DECLARATION OF DEBRA J.  
RINGOLD, PH.D. IN SUPPORT OF  
REPLY MEMORANDUM IN  
SUPPORT OF DEFENDANTS  
UNIVERSITY OF OREGON AND  
SADOFSKY'S MOTION FOR  
SUMMARY JUDGMENT**

---

I, Debra Jones Ringold, Ph.D., declare as follows:

I am Professor of Marketing in, and Dean Emeritus and JELD-WEN Chair of Free Enterprise of, the Atkinson Graduate School of Management, Willamette University. Based upon my professional experience and qualifications, which are more fully described in my report and curriculum vita, I was retained on behalf of the University of Oregon to evaluate the Declaration

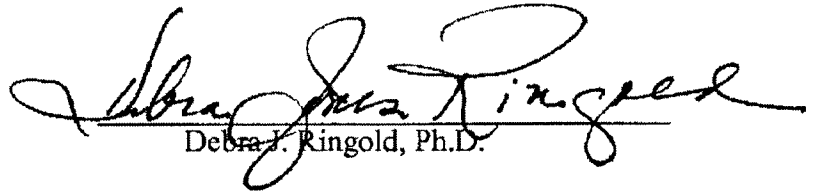
//  
//  
//

Page 1 – DECLARATION OF DEBRA J. RINGOLD, PH.D. IN SUPPORT OF REPLY  
MEMORANDUM IN SUPPORT OF DEFENDANTS UNIVERSITY OF OREGON AND  
SADOFSKY'S MOTION FOR SUMMARY JUDGMENT

of Kevin E. Cahill, Ph.D. filed in this litigation. I have prepared a report and findings, attached hereto as Exhibit A, and which I adopt as part of this declaration.

**I declare under penalty of perjury that the foregoing is true and correct.**

DATED this 3rd day of January, 2019.



Debra J. Ringold, Ph.D.

## CERTIFICATE OF SERVICE

I hereby certify that on the 4th day of January, 2019, I served the foregoing  
**DECLARATION OF DEBRA J. RINGOLD IN SUPPORT OF REPLY MEMORANDUM  
IN SUPPORT OF DEFENDANTS UNIVERSITY OF OREGON AND SADOFSKY'S  
MOTION FOR SUMMARY JUDGMENT** on the following parties at the following addresses:

Jennifer J. Middleton  
Caitlin V. Mitchell  
Johnson Johnson Lucas & Middleton, PC  
975 Oak Street, Suite 1050  
Eugene, OR 97401-3124  
jmiddleton@justicelawyers.com  
cmitchell@justicelawyers.com  
Attorneys for Plaintiff

Whitney Stark  
Albies & Stark, LLC  
210 SW Morrison Street, Suite 400  
Portland, OR 97204-3189  
whitney@albiesstark.com  
Attorneys for Plaintiff

Stephen F. English  
Cody Weston  
Nathan R. Morales  
Perkins Coie LLP  
1120 N.W. Couch Street, 10<sup>th</sup> Floor  
Portland, OR 97209-4128  
senglish@perkinscoie.com  
cweston@perkinscoie.com  
nmorales@perkinscoie.com  
Attorneys for Defendant Michael H. Schill

by the following indicated method or methods set forth below:

- ☒ **Electronic Filing using the Court's ECF System**
- ☐ **First-class mail, postage prepaid**
- ☐ **Hand-delivery**
- ☐ **Overnight courier, delivery prepaid**
- ☐ **E-mail**

*s/Paula A. Barran*

---

Paula A. Barran  
Shayda Zaerpoor Le